

# Exhibit A

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*Attorneys for Defendants Daniel F. Putnam,  
MMT Distribution, LLC, R&D Global, LLC,  
and Relief Defendant Richard T. Putnam*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DANIEL F. PUTNAM, an individual; JEAN  
PAUL RAMIREZ RICO, an individual;  
ANGEL A. RODRIGUEZ, an individual;  
MMT DISTRIBUTION, LLC, a limited  
liability company; R&D GLOBAL, LLC, a  
limited liability company,

Defendants,

RICHARD T. PUTNAM, an individual,

Relief Defendant.

**DEFENDANTS DANIEL F. PUTNAM,  
MMT DISTRIBUTION, LLC AND R&D  
GLOBAL, LLC, AND RELIEF  
DEFENDANT RICHARD T. PUTNAM'S  
NOTICE OF TAKING SECURITIES AND  
EXCHANGE COMMISSION'S  
DEPOSITION PURSUANT TO RULE  
30(b)(6) OF THE FEDERAL RULES OF  
CIVIL PROCEDURE**

Case No. 2:20-cv-00301-DBB-DAO  
District Judge David B. Barlow  
Magistrate Judge Daphne A. Oberg

TO THE ABOVE-NAMED PARTIES AND THEIR COUNSEL OF RECORD:

Please take notice that pursuant to DUCivR 30-2 and Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendants Daniel F. Putnam, MMT Distribution, LLC and R&D Global, LLC and Relief Defendant Richard T. Putnam (collectively, “Defendants”), by and through their counsel of record, will take the deposition of Plaintiff Securities Exchange Commission (the “Commission”) before a certified court reporter and videographer on July 16, 2021 at 9:00 a.m. MST and continuing thereafter until completed pursuant to applicable rules. The deposition will take place at the offices of Armstrong Teasdale LLP located at 201 South Main Street, Suite 750, Salt Lake City, Utah 84111.

The deposition will be taken before a duly qualified court reporter and will be videotaped and recorded by stenographic means.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the Commission shall designate and produce one or more officers, directors, managing agents, or other persons to testify on its behalf regarding the subjects set forth on Exhibit A. The Commission shall state, for each person designated, the matters on which the person will testify. The person so designated by the Commission shall testify as to matters known or reasonably available to the Commission.

DATED: June 1, 2021.

ARMSTRONG TEASDALE LLP

/s/ Jose. A. Abarca

Romaine C. Marshall

Jose A. Abarca

Trinity Jordan

*Attorneys for Defendants Daniel F. Putnam,  
MMT Distribution, LLC, R&D Global, LLC,  
and Relief Defendant Richard T. Putnam*

## **EXHIBIT A**

### **I. DEFINITIONS**

As used in herein:

1. “Plaintiff,” “Commission,” “You” or “Your” shall mean and refer to Plaintiff Securities and Exchange Commission and any and all of its past or present parents, subsidiaries, affiliates, officers, directors, members, shareholders, agents, representatives, employees, attorneys, accountants, and investigators.
2. “D. Putnam” shall mean and refer to Defendant Daniel F. Putnam and any and all of his past or present affiliates, agents, representatives, employees, attorneys, accountants, and investigators.
3. “R. Putnam” shall mean and refer to Relief Defendant Richard T. Putnam and any and all of his past or present affiliates, agents, representatives, employees, attorneys, accountants, and investigators.
4. “Rodriguez” shall mean and refer to Defendant Angel A. Rodriguez and any and all of his past or present affiliates, agents, representatives, employees, attorneys, accountants, and investigators.
5. “Jean Paul” shall mean and refer to Defendant Jean Paul Ramirez Rico and any and all of his past or present affiliates, agents, representatives, employees, attorneys, accountants, and investigators.
6. “MMT” shall mean and refer to Defendant MMT Distribution, LLC and any and all of its past or present parents, subsidiaries, affiliates, officers, directors, members, shareholders, agents, representatives, employees, attorneys, accountants, and investigators.

7. “R&D” shall mean and refer to Defendant R&D Global, LLC and any and all of its past or present parents, subsidiaries, affiliates, officers, directors, members, shareholders, agents, representatives, employees, attorneys, accountants, and investigators.

8. “Complaint” shall mean and refer to the Complaint the Commission filed in this case on or about May 5, 2020.

9. “Mining Operation Investment” shall have the same meaning as that term is used in the Complaint including on page 5 of the Complaint

10. “Digital Asset Trading Investment” shall have the same meaning as that term is used in the Complaint including on page 6 of the Complaint

11. “J.A. Group of Investors” shall have the same meaning as that term is used in the Complaint including on page 9 of the Complaint

12. “Currency” shall mean and refer to any form of money or medium of exchange, including but not limited to U.S. dollars, Bitcoin, Ethereum or any other type of cryptocurrency

13. “Person(s)” shall mean and include all individuals and entities, including, without limitation, any minors, sole proprietorships, associations, government entities, partnerships, trusts, corporations, limited liability companies or any other entities.

14. “Communication(s)” shall mean any transfer or receipt of information, whether orally or in writing, and any evidence of such contact, including, without limitation, any conversation or discussion by means of letter, email, telephone, text or instant message, notes or logs of telephone conversations, daily calendars, diaries, notes, memoranda, telegraph, telex, telecopy, cable, or any other medium, including any electronic audio or video device

15. “Document(s)” shall have the same broad meaning as in Federal Rule of Civil Procedure 34 and shall also mean those matters defined in Federal Rule of Evidence 1001, including, without limitation, any kind of tangible material, whether written, recorded, microfilmed, microfiched, photographed, computerized, reduced to an electronic or magnetic impulse, or otherwise preserved or rendered, and including, but not limited to, agreements; advertisements; books; ledgers; communications; correspondence; photographs; invoices; charts; telegrams; memoranda; notes, summaries, or records of telephone conversations; notes, summaries, or records of personal conversations or interviews; tape recordings; diaries; reports; notebooks; file cards; logs; minutes, notes, summaries, or records of meetings or conferences; notes, summaries, or records of investigations and negotiations; analyses, opinions, or reports of consultants; brochures; pamphlets; circulars; press releases; letters; minutes; computer printouts; microfilm; tapes; disks; computer hard drives; servers; word processing documents; spreadsheets; presentation documents; graphics; animations; images; electronic mail (including attachments that shall be kept with the accompanying email); instant messages; text messages; voicemail; audio recordings; video recordings; audiovisual recordings; databases and database subsets; other user or machine created digital information stored on computer networks, servers, computer systems, desktop computers, laptop computers, home computers, the Internet, an intranet, archives, discs, CDs, diskettes, drives, tapes, cartridges, flash drives, and other external storage media, personal digital assistants, handheld wireless devices, cellular telephones, any Blackberry or other mobile devices, pagers, and voicemail systems; any other electronic data compilations from which information can be obtained; and/or any and all written, printed, recorded, transcribed, punched, taped, typed, filmed, duplicated, reproduced, or other tangible

matter in Your possession, custody, or control, including, but not limited to, originals, electronic documents in their native format, all file copies, all other copies (no matter how or by whom prepared) that differ in any respect from an original, and all drafts in connection with such writings

## **II. SUBJECTS**

In accordance with the foregoing definitions and pursuant to DUCivR 30-2 and Rule 30(b)(6) of the Federal Rules of Civil Procedure, it is requested that the Commission designate and produce one or more officers, directors, managing agents, or other persons to testify on its behalf regarding the following subjects:

1. The factual basis of the Commission's claims and allegations against D. Putnam.
2. The factual basis of the Commission's claims and allegations against R. Putnam
3. The factual basis of the Commission's claims and allegations against Rodriguez.
4. The factual basis of the Commission's claims and allegations against Jean Paul.
5. The factual basis of the Commission's claims and allegations against MMT.
6. The factual basis of the Commission's claims and allegations against R&D.
7. The factual basis of the Commission's allegations relating to the Mining Operation Investment.
8. The factual basis of the Commission's allegations relating to the Digital Asset Trading Investment.
9. The factual basis of the Commission's allegations relating to the J.A. Group of Investors.
10. All aspects of the Commission's responses to discovery requests served in the above-captioned litigation.

11. All aspects of the procedures and steps taken by the Commission to produce Documents responsive to the requests for production Defendants served upon the Commission in the above-captioned litigation.
12. All aspects of the procedures and steps taken by the Commission to serve process on, communicate with, and/or obtain documents and information from Jean Paul.

**CERTIFICATE OF SERVICE**

I hereby certify that that on June 1, 2021, I caused a true and correct copy of the foregoing document to be served via Email on the following:

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